# NAVAJO GENERATING STATION EXCESS EMISSIONS REPORT FIRST QUARTER, 2018



#### NAVAJO GENERATING STATION

P. O. BOX 850 PAGE, ARIZONA 86040

April 30, 2018

Dr. Donald Benn, Executive Director Navajo Nation Environmental Protection Agency P.O. Box 339 Window Rock, AZ 86515 And Navajo Nation EPA Air Quality Control Program Operating Permit Program Route 112, North Bldg. #2837 PO Box 529 Fort Defiance, AZ 86504

Director, Air Division
U.S. Environmental Protection Agency, Region IX
Mail Code: AIR-5
75 Hawthorne Street
San Francisco, CA 94105

RE: Navajo Generating Station FIP – 40 CFR §49.24, Title V Permit to Operate No. NN-ROP-05-06 and PSD Permit Number AZ 08-01 Quarterly Emission Report

Dear Directors,

Enclosed is the First Quarter 2018 emissions report for Navajo Generating Station. The report contains the following information:

- Daily electrical energy generated in megawatt-hours (permit condition II.B.5.b).
- Sulfur dioxide and carbon dioxide information according to the procedures set forth at 40 CFR 60.7 and permit condition II.B.5.a;
- Identification of periods when opacity values exceeded 20 %, excluding condensed uncombined water droplets over any 6-minute period, and 40% averaged over 6 minutes, during absorber upset transition periods.

Page Two (cover letter) April 26, 2018

- Identification of periods when sulfur dioxide emissions exceeded 1.0 lb/mmBTU as a plantwide 3-hour average, and a CEMS data assessment according to the procedures set forth at 40 CFR §49.24(d)(1) of NGS FIP.
- Nitrogen Oxide and Carbon Monoxide information according to PSD Permit Number AZ 08-01A, condition IX.G.5

With respect to the opacity data presented in the report, please note that 6-minute opacity readings are not individually listed during scrubber operations because the saturated stack conditions impedes the accuracy of the readings. The report identifies the block time periods for each unit that the scrubbers were operational and the stacks were saturated, in lieu of reporting the individual 6-minute wet stack readings.

Please contact Paul Ostapuk at (928) 645-6577 if you have any questions.

Sincerely,

Kenneth J. Frazier

Plant Manager / Responsible Official

Hownett J. Frazier

**Enclosures** 

cc: William J. Mcclellan, SRP – Manager Air Quality & Environmental Services Environmental File

#### **CEM EXCESS EMISSION REPORT**

Salt River Project Navajo Generating Station Page, Arizona

UNIT # 1, 2, 3

YEAR 2018

QUARTER FIRST

This report is in accordance with reporting requirements set forth in the NGS FIP – 40 CFR §49.24, Title V Permit to Operate, Permit No. NN-ROP 05-06, Section II.B.5 and PSD Permit Number AZ 08-01A, Condition IX.G.5.

Emission standards in this report are in accordance with the NGS FIP – 40 CFR §49.24 sections (d)(1), (d)(3), (d)(4), (e)(8), Title V Permit to Operate, NN-ROP-05-06 Section II.B.2 and PSD Permit Number AZ 08-01A Conditions IX.B.1 and IX.B.2

EXCESS EMISSIONS FOR QUARTER: None

#### NAVAJO GENERATING STATION CEM SUMMARY SHEET FIRST QUARTER OF 2018

	UNIT 1	UNIT 2	<u>UNIT 3</u>
# Hours of I.D. Fan Operation	2058.2 hrs	1988.5 hrs	2064.3 hrs
# Hours Boiler Operation	2030.9 hrs	1964.9 hrs	2035.7 hrs
Opacity Monitor Availability	99.98 %	98.20 %	99.92 %
SO2 #/mmBTU Availability	99.46 %	99.39 %	99.95 %
NOx #/mmBTU Availability	99.36 %	97.97 %	99.95 %
CO #/mmBTU Availability	99.80 %	100 %	100 %
Opacity Emission >20% (6-Min)	0.0 hrs	0.0 hrs	0.0 hrs
% Operating Time	0.00 %	0.00 %	0.00 %
Opacity Emission >40% (6-Min)	0.0 hrs	0.0 hrs	0.0 hrs
% Operating Time	0.00 %	0.00 %	0.00 %
SO2 #/mmBTU > 0.1 (365BOD)	0.0 days	0.0 days	0.0 days
% Operating Time	0.00 %	0.00 %	0.00 %
SO2 #/mmBTU >1.0 (3Hr)	0.0 days	0.0 days	0.0 days
% Operating Time	0.0 %	0.0 %	0.0 %
NOx #/mmBTU >0.24 (30D)	0.0 days	0.0 days	0.0 days
% Operating Time	0.0 %	0.0 %	0.0 %
CO #/mmBTU >0.23 (30D)	0.0 days	0.0 days	0.0 days
% Operating Time	0.0 %	0.0 %	0.0 %
CO #/mmBTU >0.15 (12M)	0.0 days	0.0 days	0.0 days
% Operating Time	0.0 %	0.0 %	0.0 %

Plant Coal, Ash and Road Sweeping Activities - Opacity Emission ≥20% (hours)

## NAVAJO GENERATING STATION CEMS MONITOR LISTING

Teledyne Monitor Labs Inc.
Opacity Monitor
Model Lighthawk 560

Teledyne Monitor Labs Inc. Flow Monitor Ultra Flow 150

Thermo Environmental Sulfur Dioxide Monitor Model 43i

> Thermo Environmental CO<sub>2</sub> Monitor Model 410i

> Thermo Environmental NO<sub>x</sub> Monitor Model 42i

Thermo Environmental CO Monitor Model 48i

### **UNIT 1 REPORT SUMMARY**

- o Daily Electric Energy Report
- o Opacity Excess Emission and Monitoring System Performance
- o Excess Wet Opacity Report
- Excess Dry Opacity Report
- o Opacity Downtime Report
- o SO2 Excess Emission and Monitoring System Performance
- SO2 Excess Emission Report 1.0 lb/mmBTU
- SO2 Excess Emission Report 0.1 lb/mmBTU
- SO2 Downtime Report
- o CO2 Downtime Report
- NOx Excess Emission Report
- o NOx Downtime Report
- o CO Excess Emission Report- 30-Day
- o CO Excess Emission Report- 12-Month
- o CO Downtime Report

## 40 CFR 52.145.d.5.iii Daily Electric Energy Report Gigawatt Hours

Source: Unit 1 Channel: 1 GW365

#### Report for 01/01/2018 thru 03/31/2018

Date	Gigawatts	Date	Gigawatts	Date	Gigawatts
01/01/18	17.30	02/01/18	14.05	03/01/18	15.33
01/02/18	16.90	02/02/18	14.55	03/02/18	14.72
01/03/18	17.90	02/03/18	12.95	03/03/18	14.05
01/04/18	17.74	02/04/18	12.16	03/04/18	
01/05/18	17.18	02/05/18	12.62	03/05/18	
01/06/18	16.16	02/06/18	12.28	03/06/18	
01/07/18	15.51	02/07/18	12.38	03/07/18	
01/08/18	16.58	02/08/18	12.73	03/08/18	
01/09/18	16.33	02/09/18	13.15	03/09/18	9.67
01/10/18	14.82	02/10/18		03/10/18	9.16
01/11/18	14.56	02/11/18		03/11/18	11.39
01/12/18	16.81	02/12/18		03/12/18	13.08
01/13/18	14.51	02/13/18		03/13/18	14.78
01/14/18	14.15	02/14/18	14.80	03/14/18	14.23
01/15/18	15.65	02/15/18	15.27	03/15/18	11.85
01/16/18	16.75	02/16/18	17.21	03/16/18	12.22
01/17/18		02/17/18	15.49	03/17/18	11.59
01/18/18	15.91	02/18/18	13.02	03/18/18	12.40
01/19/18	15.00	02/19/18	14.86	03/19/18	12.57
01/20/18	16.25	02/20/18	15.97	03/20/18	11.87
01/21/18	15.44	02/21/18	17.84	03/21/18	11.83
01/22/18	17.92	02/22/18	17.78	03/22/18	11.29
01/23/18	16.44	02/23/18	16.94	03/23/18	13.28
01/24/18	17.54	02/24/18	16.53	03/24/18	10.13
01/25/18	16.62	02/25/18	15.67	03/25/18	13.30
01/26/18	15.59	02/26/18	14.77	03/26/18	13.64
01/27/18	15.21	02/27/18	15.12	03/27/18	14.64
01/28/18		02/28/18	15.56	03/28/18	15.13
01/29/18				03/29/18	15.82
01/30/18				03/30/18	15.83
01/31/18				03/31/18	15.11

----- Invalid Boiler Operating Day

## 40 CFR Part 60 CEM Quarterly Report Excess Emission and Monitoring System Performance

#### Reporting dates 01/01/2018 00:00 through 03/31/2018 23:59

Pollutant: Opacity / "1 Opacity"

Emission Limit: 40

Company Name: SRP - Navajo, Unit 1

Address: Navajo Generating Station Page, AZ 86040

Unit Description: coal-fired cyclonic boiler power plant

Total source operating time in reporting period: 2058.2 hours

Emission Data Summary(note 1 )		CEMS Downtime Summary(note 1 )	
1. Duration of excess emissions in period due	to:	1. Duration of CEMS downtime in period due to:	
a. Start Up/Shut Down	0.0	a. Monitoring Equipment Malfunction	0.0
b. Control Equipment Failure	0.0	b. Non-Monitoring Equipment Malfunction	0.0
c. Process Problems	0.0	c. Quality Assurance	0.0
d. Exempt (Wet Stack - Scrubber Operation)	2058.2	d. Other Known Monitor Downtime Cause	0.5
e. UnKnown Excess Emissions Cause	0.0	e. UnKnown Monitor Downtime Cause	0.0
2. Total duration of excess emission	0.0	2. Total duration of CEMS downtime	0.5
3. Excess emission duration (%)	0.00%	3. CEMS downtime (%)	0.02%

Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement(s) made in this document or its attachments may be punishable as a criminal offense."

Name: Walter H. Begay

Signature:

Title: Air Quality Environmental Engineer

Data.

#### Navajo Unit 1 Excess Wet Opacity Report

SRP - Navajo, Unit 1 Navajo Generating Station Page, AZ 86040 Start: 01/01/2018 00:00 End: 03/31/2018 23:59

POLLUTANT: 1 Opacity SOURCE: Unit 1 EPISODE: Opacity Over Limit

Incident	Incident	Length		
Start	End	Hours	Reason	Action
01/01/18 00:00 -	01/29/18 11:50	683.8	Wet Scrubber	Operation Exempt
01/31/18 03:42 -	02/11/18 04:44	265.0	Wet Scrubber	Operation Exempt
02/11/18 11:05 -	03/05/18 09:05	526.0	Wet Scrubber	Operation Exempt
03/07/18 16:37 -	03/31/18 23:59	583.4	Wet Scrubber	Operation Exempt

Total Duration: 2058.2 Hours

#### Navajo Unit 1 Excess Dry Opacity Report

SRP - Navajo, Unit 1 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00 End: 03/31/2018 23:59

POLLUTANT: 1 Opacity SOURCE: Unit 1 EPISODE: Opacity Over Limit

Incident

Start

Incident End

Length

Hours

Reason

No Excess Emissions

Total Duration 0.0 Hours

#### Navajo Unit 1 Opacity Downtime Report

SRP - Navajo, Unit 1 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00 End: 03/31/2018 23:59

POLLUTANT: 1 Opacity SOURCE: Unit 1 EPISODE: Opacity Analyzer Downtime

Incident Start	Incident End	Length Mins.	Reason	
01/16/18 10:36	- 01/16/18 10:41	06 Pre	ventative Maintenance	Activities
02/20/18 14:51	- 02/20/18 15:05	12 Pre	ventative Maintenance	Activities
03/22/18 13:36	- 03/22/18 13:41	06 Pre	ventative Maintenance	Activities
03/28/18 09:30	- 03/28/18 09:35	06 Pre	ventative Maintenance	Activities

TOTAL DURATION = 0.5 Hours

## 40 CFR Part 60 CEM Quarterly Report Excess Emission and Monitoring System Performance

#### Reporting dates 01/01/2018 00:00 through 03/31/2018 23:59

Pollutant: SO2 lb/MMBtu (365 Boiler Operating Day rolling average) Emission Limit: 0.1

Company Name: SRP - Navajo, Unit 1

Address: Navajo Generating Station Page, AZ 86040

Unit Description: coal-fired cyclonic boiler power plant

Total source operating time in reporting period: 2030.9 hours

Emission Data Summary(note 1 )	CEMS Downtime Summary(note 1 )
1. Duration of excess emissions in period due to:	1. Duration of CEMS downtime in period due to:
a. Start Up/Shut Down0	.0 a. Monitoring Equipment Malfunction 0.0
b. Control Equipment Failure 0	.0 b. Non-Monitoring Equipment Malfunction 2.0
c. Process Problems0	.0 c. Quality Assurance 4.0
d. Exempt (Wet Stack - Scrubber Operation) 0	.0 d. Other Known Monitor Downtime Cause 5.0
e. UnKnown Excess Emissions Cause 0	.0 e. UnKnown Monitor Downtime Cause 0.0
2. Total duration of excess emission 0	.0 2. Total duration of CEMS downtime 11.0
3. Excess emission duration (%) 0.0	0% 3. CEMS downtime (%)

Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement(s) made in this document or its attachments may be punishable as a criminal offense."

Name: Walter H. Begay
Signature:

Title: Air Quality Environmental Engineer

Date: 92018

#### Navajo Unit 1 SO2 Excess Emission Report

SRP - Navajo, Unit 1 Navajo Generating Station Page, AZ 86040 Start: 01/01/2018 00:00 End: 03/31/2018 23:59

Emission Limit: 1.0 lb/MMBtu, 3 hr. plant wide average

Date and Time Period

Magnitude

Reason

No Excess Emission

#### Navajo Unit 1 SO2 Excess Emission Report

SRP - Navajo, Unit 1 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00

End: 03/31/2018 23:59

Emission Limit: 0.1 lb/MMBtu, 365 BOD rolling average

Date and Time Period Magnitude

Reason

No Excess Emission

#### Navajo Unit 1 SO2 Downtime Report

SRP - Navajo, Unit 1 Navajo Generating Station Page, AZ 86040 Start: 01/01/2018 00:00 End: 03/31/2018 23:59

POLLUTANT: 1 SO2 ppm SOURCE: Unit 1 EPISODE: SO2 Analyzer Downtime

Incident	Incident	Length	
Start	End	Hrs.	Reason
01/31/18 09:00	- 01/31/18 10:59	2	Non-Monitor Maintenance
02/01/18 15:00	- 02/01/18 17:59	3	Quality Assurance Activities
02/11/18 15:00	- 02/11/18 15:59	1	Other Known Monitor Downtime Cause
02/11/18 19:00	- 02/11/18 22:59	4	Other Known Monitor Downtime Cause
03/27/18 10:00	- 03/27/18 10:59	1	Quality Assurance Activity

#### Navajo Unit 1 CO2 Downtime Report

SRP - Navajo, Unit 1 Navajo Generating Station Page, AZ 86040

POLLUTANT: 1 CO2 cor SOURCE: Unit 1 EPISODE: CO2 Analyzer Downtime

Start: 1/01/2018 00:00

End: 3/31/2018 23:59

Incident	Incident	Length	
Start	End	Hrs.	Reason
01/31/18 09:00	- 01/31/18 10:59	2	Non-Monitor Maintenance - Dilution
02/01/18 15:00	- 02/01/18 17:59	3	Quality Assurance Activity
02/11/18 15:00	- 02/11/18 15:59	1	Other Known Monitor Downtime Cause
02/11/18 19:00	- 02/11/18 22:59	4	Other Known Monitor Downtime Cause
02/27/18 09:00	- 02/27/18 09:59	1	Quality Assurance Activity
02/27/18 10:00	- 02/27/18 10:59	1	Monitor in Calibration (non-daily)
03/27/18 10:00	- 03/27/18 10:59	1	Quality Assurance Activity

#### Navajo Unit 1 NOx Excess Emission Report

SRP - Navajo, Unit 1 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00

End: 03/31/2018 23:59

Emission Limit: 0.24 lb/MMBtu, 30 Day rolling average

Date and Time Period

Magnitude

Reason

No Excess Emission

#### Navajo Unit 1 NOx Downtime Report

SRP - Navajo, Unit 1 Navajo Generating Station Page, AZ 86040 Start: 01/01/2018 00:00 End: 03/31/2018 23:59

POLLUTANT: 1 NOx cor SOURCE: Unit 1 EPISODE: NOx Analyzer Downtime

Incident	Incident	Length	
Start	End	Hrs.	Reason
01/31/18 09:00	- 01/31/18 10:59	2	Non-Monitor Maintenance
02/01/18 15:00	- 02/01/18 17:59	3	Quality Assurance Activities
02/11/18 15:00	- 02/11/18 15:59	1	Other Known Monitor Downtime Cause
02/11/18 19:00	- 02/11/18 22:59	4	Other Known Monitor Downtime Cause
02/27/18 09:00	- 02/27/18 10:59	2	Quality Assurance Activities
03/27/18 10:00	- 03/27/18 10:59	1	Quality Assurance Activities

#### Navajo Unit 1 CO Excess Emission Report

SRP - Navajo, Unit 1 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00 End: 03/31/2018 23:59

Emission Limit: 0.23 lb/MMBtu, 30 Day rolling average

Date and Time Period

Magnitude

Reason

No Excess Emissions

#### Navajo Unit 1 CO Excess Emission Report

SRP - Navajo, Unit 1 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00 End: 03/31/2018 23:59

Emission Limit: 0.15 lb/MMBtu, 12-Month rolling average

Date and Time Period

Magnitude

Reason

No Excess Emission

#### Navajo Unit 1 CO Downtime Report

SRP - Navajo, Unit 1 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00 End: 03/31/2018 23:59

POLLUTANT: 1 CO cor SOURCE: Unit 1 EPISODE: CO Analyzer Downtime

Incident	Incident	Length	
Start	End	Hrs.	Reason
01/31/18 09:00 -	01/31/18 09:59	1	Non-Monitor Maintenance - Dilution
02/01/18 15:00 -	02/01/18 17:59	3	Quality Assurance Activity

## **UNIT 2 REPORT SUMMARY**

- o Daily Electric Energy Report
- o Opacity Excess Emission and Monitoring System Performance
- o Excess Wet Opacity Report
- o Excess Dry Opacity Report
- o Opacity Downtime Report
- o SO2 Excess Emission and Monitoring System Performance
- o SO2 Excess Emission Report 1.0 lb/mmBTU
- o SO2 Excess Emission Report 0.1 lb/mmBTU
- o SO2 Downtime Report
- o CO2 Downtime Report
- o NOx Excess Emission Report
- o NOx Downtime Report
- o CO Excess Emission Report- 30-Day
- o CO Excess Emission Report- 12-Month
- o CO Downtime Report

# 40 CFR 52.145.d.5.iii Daily Electric Energy Report Gigawatt Hours

Source: Unit 2 Channel: 2 GW365

#### Report for 01/01/2018 thru 03/31/2018

Date	Gigawatts	Date	Gigawatts	Date	Gigawatts
01/01/18		02/01/18	15.71	03/01/18	12.08
01/02/18	11.30	02/02/18	14.64	03/02/18	12.60
01/03/18	17.70	02/03/18	12.44	03/03/18	12.00
01/04/18	17.42	02/04/18	11.70	03/04/18	13.30
01/05/18	17.01	02/05/18	12.50	03/05/18	16.98
01/06/18	15.82	02/06/18	12.27	03/06/18	16.40
01/07/18	15.45	02/07/18	12.84	03/07/18	18.24
01/08/18	16.19	02/08/18	13.50	03/08/18	
01/09/18	15.86	02/09/18	14.67	03/09/18	
01/10/18	14.27	02/10/18	14.58	03/10/18	13.54
01/11/18	13.58	02/11/18	15.00	03/11/18	12.66
01/12/18	14.66	02/12/18	13.67	03/12/18	13.93
01/13/18	15.78	02/13/18	15.15	03/13/18	14.24
01/14/18	15.96	02/14/18	16.02	03/14/18	14.88
01/15/18	16.09	02/15/18	15.45	03/15/18	12.38
01/16/18	17.95	02/16/18	17.12	03/16/18	14.09
01/17/18	16.87	02/17/18	15.59	03/17/18	13.98
01/18/18	17.51	02/18/18	13.18	03/18/18	13.51
01/19/18	15.10	02/19/18	15.18	03/19/18	14.07
01/20/18	16.17	02/20/18	16.32	03/20/18	13.83
01/21/18	16.38	02/21/18	18.20	03/21/18	13.99
01/22/18		02/22/18	17.63	03/22/18	13.77
01/23/18	17.22	02/23/18	17.26	03/23/18	14.33
01/24/18	17.99	02/24/18	16.80	03/24/18	13.15
01/25/18	16.52	02/25/18	16.21	03/25/18	
01/26/18	15.70	02/26/18	15.02	03/26/18	
01/27/18	15.07	02/27/18	15.34	03/27/18	
01/28/18	14.84	02/28/18	12.36	03/28/18	
01/29/18	17.85			03/29/18	
01/30/18	17.34			03/30/18	
01/31/18	15.61			03/31/18	

Invalid Boiler Operating Day

## 40 CFR Part 60 CEM Quarterly Report Excess Emission and Monitoring System Performance

#### Reporting dates 01/01/2018 00:00 through 03/31/2018 23:59

Pollutant: Opacity / "2 Opacity"

Emission Limit: 40

Company Name: SRP - Navajo, Unit 2

Address: Navajo Generating Station Page, AZ 86040

Unit Description: coal-fired cyclonic boiler power plant

Total source operating time in reporting period: 1988.5 hours

Emission Data Summary(note 1 )		CEMS Downtime Summary(note 1 )	
1. Duration of excess emissions in period due to:		1. Duration of CEMS downtime in period due to:	
a. Start Up/Shut Down	0.0	a. Monitoring Equipment Malfunction	0.0
b. Control Equipment Failure	0.0	b. Non-Monitoring Equipment Malfunction	0.0
c. Process Problems	0.0	c. Quality Assurance	1.0
d. Exempt (Wet Stack - Scrubber Operation) 19	88.5	d. Other Known Monitor Downtime Cause	34.7
e. UnKnown Excess Emissions Cause	0.0	e. UnKnown Monitor Downtime Cause	0.0
2. Total duration of excess emission	0.0	2. Total duration of CEMS downtime	35.7
3. Excess emission duration (%)0	.00%	3. CEMS downtime (%)	1.80%

Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement(s) made in this document or its attachments may be punishable as a criminal offense."

Name: Walter H. Begay

Signature:

Title: Air Quality Environmental Engineer

Date: 4100113

#### Navajo Unit 2 Excess Wet Opacity Report

SRP - Navajo, Unit 2 Navajo Generating Station Page, AZ 86040 Start: 01/01/2018 00:00 End: 03/31/2018 23:59

POLLUTANT: 2 Opacity SOURCE: Unit 2 EPISODE: Opacity Over Limit

Incident	Incident	Length			
Start	End	Hours_	Reason	Acti	on
01/01/18 17:45 -	03/08/18 13:58	1580.2	Wet Scrubber	Operation	Exempt
03/09/18 10:14 -	03/25/18 16:19	390.1	Wet Scrubber	Operation	Exempt
03/31/18 05:45 -	03/31/18 23:59	18.2	Wet Scrubber	Operation	Exempt

Total Duration: 1988.5 Hours

#### Navajo Unit 2 Excess Dry Opacity Report

SRP - Navajo, Unit 2 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00 End: 03/31/2018 23:59

POLLUTANT: 1 Opacity SOURCE: Unit 2 EPISODE: Opacity Over Limit

Incident Start

Incident End

Length Hours\_

Reason

No Excess Emissions

Total Duration 0.0 Hours

#### Navajo Unit 2 Opacity Downtime Report

Start: 01/01/2018 00:00

End: 03/31/2018 23:59

SRP - Navajo, Unit 2 Navajo Generating Station Page, AZ 86040

POLLUTANT: 2 Opacity SOURCE: Unit 2 EPISODE: Opacity Analyzer Downtime

Incident		ength
Start	End	Mins. Reason
01/16/18 09:58 - 01/10	6/18 09:53 06	Monitor Maintenance Activities
01/30/18 10:24 - 01/30	0/18 10:29 06	Monitor Maintenance Activities
02/04/18 08:06 - 02/04	4/18 08:17 12	Monitor Maintenance Activities
02/16/18 18:18 - 02/1	6/18 19:47 90	Non-Monitor Maintenance Activities
02/16/18 19:54 - 02/1	6/18 02:23 390	Non-Monitor Maintenance Activities
02/17/18 02:30 - 02/1	7/18 02:59 30	Non-Monitor Maintenance Activities
02/17/18 03:06 - 02/1	7/18 03:35 30	Non-Monitor Maintenance Activities
02/17/18 03:42 - 02/1	7/18 03:53 12	Non-Monitor Maintenance Activities
02/17/18 04:00 - 02/1	7/18 04:29 30	Non-Monitor Maintenance Activities
02/17/18 04:36 - 02/1	7/18 04:59 24	Non-Monitor Maintenance Activities
02/17/18 05:06 - 02/1	7/18 05:29 24	Non-Monitor Maintenance Activities
02/17/18 05:42 - 02/1	7/18 10:53 312	Non-Monitor Maintenance Activities
02/17/18 11:00 - 02/1	8/18 05:29 1110	Non-Monitor Maintenance Activities
02/20/18 10:24 - 02/2	0/18 10:29 06	Monitor Maintenance Activities
03/20/18 14:24 - 03/2	0/18 15:23 60	Quality Assurance Activities

TOTAL DURATION = 35.7 Hours

# 40 CFR Part 60 CEM Quarterly Report Excess Emission and Monitoring System Performance

#### Reporting dates 01/01/2018 00:00 through 03/31/2018 23:59

Pollutant: SO2 lb/MMBtu (365 Boiler Operating Day rolling average) Emission Limit: 0.1

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Company Name: SRP - Navajo, Unit 2

Address: Navajo Generating Station Page, AZ 86040

Unit Description: coal-fired cyclonic boiler power plant

Total source operating time in reporting period: 1964.9 hours

Emission Data Summary(note 1 )	CEMS Downtime Summary(note 1 )		
1. Duration of excess emissions in period due	to:	1. Duration of CEMS downtime in period due to:	
a. Start Up/Shut Down	0.0	a. Monitoring Equipment Malfunction	0.0
b. Control Equipment Failure	0.0	b. Non-Monitoring Equipment Malfunction	0.0
c. Process Problems	0.0	c. Quality Assurance	7.0
d. Exempt (Wet Stack - Scrubber Operation)	0.0	d. Other Known Monitor Downtime Cause	0.0
e. UnKnown Excess Emissions Cause	0.0	e. UnKnown Monitor Downtime Cause	5.0
2. Total duration of excess emission	0.0	2. Total duration of CEMS downtime	12.0
3. Excess emission duration (%)	0.00%	3. CEMS downtime (%)	0.61%

Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement(s) made in this document or its attachments may be punishable as a criminal offense."

Name: Walter H. Begay
Signature: ( ) although
Title: Air Quality Environmental Engineer
Date: 42018

#### Navajo Unit 2 SO2 Excess Emission Report

SRP - Navajo, Unit 2 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00 End: 03/31/2018 23:59

Emission Limit: 1.0 lb/MMBtu, 3 hr. plant wide average

Date and Time Period Magnitude

Reason

No Excess Emission

#### Navajo Unit 2 SO2 Excess Emission Report

SRP - Navajo, Unit 2 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00

End: 03/31/2018 23:59

Emission Limit: 0.1 lb/MMBtu, 365 BOD rolling average

Date and Time Period

Magnitude

Reason

No Excess Emission

#### Navajo Unit 2 SO2 Downtime Report

SRP - Navajo, Unit 2 Navajo Generating Station Page, AZ 86040 Start: 01/01/2018 00:00 End: 03/31/2018 23:59

POLLUTANT: 2 SO2 ppm SOURCE: Unit 2 EPISODE: SO2 Analyzer Downtime

Incident	Incident	Length	
Start	End	Hrs.	Reason
02/22/18 10:00	- 02/22/18 10:59	1	Quality Assurance Activity
02/22/18 13:00	- 02/22/18 14:59	2	Quality Assurance Activity
03/12/18 13:00	- 03/12/18 13:59	1	Quality Assurance Activity
03/12/18 16:00	- 03/12/18 16:59	1	Quality Assurance Activity
03/13/18 07:00	- 03/13/18 07:59	1	Quality Assurance Activity
03/31/18 05:00	- 03/31/18 05:59	1	Quality Assurance Activity
03/31/18 16:00	- 03/31/18 20:59	5	Unknown Monitor Downtime Cause

#### Navajo Unit 2 CO2 Downtime Report

SRP - Navajo, Unit 2 Navajo Generating Station Page, AZ 86040 Start: 01/01/2018 00:00 End: 03/31/2018 23:59

POLLUTANT: 2 CO2 cor SOURCE: Unit 2 EPISODE: CO2 Analyzer Downtime

Incident Start	Incident End	Length Hrs.	Reason
02/22/18 10:00 -	02/22/18 10:59	1	Quality Assurance Activity
02/22/18 13:00 -	02/22/18 14:59	2	Quality Assurance Activity
03/12/18 13:00 -	03/12/18 13:59	1	Quality Assurance Activity
03/12/18 16:00 -	03/12/18 16:59	1	Quality Assurance Activity
03/13/18 07:00 -	03/13/18 07:59	1	Quality Assurance Activity
03/31/18 05:00 -	03/31/18 05:59	1	Quality Assurance Activity
03/31/18 16:00 -	03/31/18 20:59	5	Unknown Monitor Downtime Cause

#### Navajo Unit 2 NOx Excess Emission Report

SRP - Navajo, Unit 2 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00

End: 03/31/2018 23:59

Emission Limit: 0.24 lb/MMBtu, 30 Day rolling average

Date and Time Period

Magnitude

Reason

No Excess Emission

#### Navajo Unit 2 NOx Downtime Report

SRP - Navajo, Unit 2 Navajo Generating Station Page, AZ 86040 Start: 01/01/2018 00:00 End: 03/31/2018 23:59

POLLUTANT: 2 NOx cor SOURCE: Unit 2 EPISODE: NOx Analyzer Downtime

Incident	Incident	Length	
Start	End	Hrs.	Reason
01/28/18 05:00	- 01/28/18 08:59	4	Quality Assurance Activities
02/10/18 05:00	- 02/10/18 07:59	3	NOx Analyzer Problem
02/13/18 05:00	- 02/13/18 07:59	3	NOx Analyzer Calibration Failure
02/15/18 05:00	- 02/15/18 07:59	3	NOx Analyzer Problem
02/19/18 05:00	- 02/19/18 06:59	2	NOx Analyzer Problem
02/22/18 10:00	- 02/22/18 10:59	1	Quality Assurance Activities
02/22/18 13:00	- 02/22/18 14:59	2	Quality Assurance Activities
03/09/18 21:00	- 03/10/18 08:59	12	Monitor Equipment Malfunction
03/11/18 06:00	- 03/11/18 06:59	1	NOx Analyzer Problem
03/12/18 13:00	- 03/12/18 13:59	1	Quality Assurance Activities
03/12/18 16:00	- 03/12/18 16:59	1	Quality Assurance Activities
03/13/18 07:00	- 03/13/18 07:59	1	Quality Assurance Activities
03/31/18 05:00	- 03/31/18 05:59	1	NOx Analyzer Problem
03/31/18 16:00	- 03/31/18 20:59	5	Unknown Monitor Downtime Cause

#### Navajo Unit 2 CO Excess Emission Report

SRP - Navajo, Unit 2 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00

End: 03/31/2018 23:59

Emission Limit: 0.23 lb/MMBtu, 30 Day rolling average

Date and Time Period Magnitude

Reason

No Excess Emission

#### Navajo Unit 2 CO Excess Emission Report

SRP - Navajo, Unit 2 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00

End: 03/31/2018 23:59

Emission Limit: 0.15 lb/MMBtu, 12-Month rolling average

Date and Time Period

Magnitude

Reason

No Excess Emission

#### Navajo Unit 2 CO Downtime Report

SRP - Navajo, Unit 2 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00

End: 03/31/2018 23:59

POLLUTANT: 2 CO cor SOURCE: Unit 2 EPISODE: CO Analyzer Downtime

Reason

Incident Start

Incident End

Length

None

Hrs.

### **UNIT 3 REPORT SUMMARY**

- Daily Electric Energy Report
- o Opacity Excess Emission and Monitoring System Performance
- Excess Wet Opacity Report
- o Excess Dry Opacity Report
- o Opacity Downtime Report
- o SO2 Excess Emission and Monitoring System Performance
- o SO2 Excess Emission Report 1.0 lb/mmBTU
- SO2 Excess Emission Report 0.1 lb/mmBTU
- o SO2 Downtime Report
- o CO2 Downtime Report
- o NOx Excess Emission Report
- o NOx Downtime Report
- o CO Excess Emission Report- 30-Day
- o CO Excess Emission Report- 12-Month
- o CO Downtime Report

# 40 CFR 52.145.d.5.iii Daily Electric Energy Report Gigawatt Hours

Source: Unit 3 Channel: 3 GW365

### Report for 01/01/2018 thru 03/31/2018

Date	Gigawatts	Date	Gigawatts	Date	Gigawatts
01/01/18	17.21	02/01/18	15.69	03/01/18	14.80
01/02/18	17.16	02/02/18	14.72	03/02/18	14.46
01/01/18	17.86	02/03/18	12.45	03/03/18	13.66
01/04/18	16.55	02/04/18	12.48	03/04/18	13.87
01/05/18	17.44	02/05/18	12.93	03/05/18	16.51
01/06/18	16.51	02/06/18	12.43	03/06/18	16.48
01/07/18	15.44	02/07/18	13.07	03/07/18	17.81
01/08/18	16.43	02/08/18	13.17	03/08/18	16.20
01/09/18	15.48	02/09/18	13.61	03/09/18	17.32
01/10/18	13.60	02/10/18	14.14	03/10/18	13.15
01/11/18	13.92	02/11/18	14.25	03/11/18	11.62
01/12/18	14.83	02/12/18	12.32	03/12/18	13.19
01/13/18	16.29	02/13/18	13.64	03/13/18	14.18
01/14/18	15.98	02/14/18	15.63	03/14/18	14.81
01/15/18		02/15/18	15.92	03/15/18	12.03
01/16/18		02/16/18	17.66	03/16/18	12.28
01/17/18		02/17/18	15.75	03/17/18	12.02
01/18/18		02/18/18	13.24	03/18/18	12.48
01/19/18	15.32	02/19/18	14.51	03/19/18	12.18
01/20/18		02/20/18	15.40	03/20/18	11.88
01/21/18	16.65	02/21/18	17.34	03/21/18	11.88
01/22/18	17.73	02/22/18	17.54	03/22/18	12.04
01/23/18		02/23/18	16.98	03/23/18	12.69
01/24/18		02/24/18	16.77	03/24/18	10.73
01/25/18	15.29	02/25/18	16.25	03/25/18	12.99
01/26/18	15.58	02/26/18	14.96	03/26/18	13.29
01/27/18	15.65	02/27/18	15.20	03/27/18	
01/28/18	14.53	02/28/18	15.14	03/28/18	
01/29/18	17.84			03/29/18	
01/30/18	17.07			03/30/18	
01/31/18	15.58			03/31/18	

Invalid Boiler Operating Day

### 40 CFR Part 60 CEM Quarterly Report Excess Emission and Monitoring System Performance

Reporting dates 01/01/2018 00:00 through 03/31/2018 23:59

Pollutant: Opacity / "3 Opacity"

Emission Limit: 40

Company Name: SRP - Navajo, Unit 3

Address: Navajo Generating Station Page, AZ 86040

Unit Description: coal-fired cyclonic boiler power plant

Total source operating time in reporting period: 2064.3 hours

Emission Data Summary(note 1 )	CEMS Downtime Summary(note 1 )		
1. Duration of excess emissions in period due	1. Duration of CEMS downtime in period due to:		
a. Start Up/Shut Down	0.0	a. Monitoring Equipment Malfunction	0.0
b. Control Equipment Failure	0.0	b. Non-Monitoring Equipment Malfunction	0.0
c. Process Problems	0.0	c. Quality Assurance	0.9
d. Exempt (Wet Stack - Scrubber Operation)	2064.3	d. Other Known Monitor Downtime Cause	0.8
e. UnKnown Excess Emissions Cause	0.0	e. UnKnown Monitor Downtime Cause	0.0
2. Total duration of excess emission	0.0	2. Total duration of CEMS downtime	1.7
3. Excess emission duration (%)	0.0%	3. CEMS downtime (%)	0.08%

Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.

\*Please see cover letter and attached "Written Notification Report for Excess Emissions and Control System Outage" for explanation of potential excess emissions.

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement(s) made in this document or its attachments may be punishable as a criminal offense."

Name: Walter H. Begay

Signature: Walth

Title: Air Quality Environmental Engine

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#### Navajo Unit 3 Excess Wet Opacity Report

SRP - Navajo, Unit 3 Navajo Generating Station Page, AZ 86040 Start: 01/01/2018 00:00 End: 03/31/2018 23:59

POLLUTANT: 3 Opacity SOURCE: Unit 3 EPISODE: Opacity Over Limit

Incident	Incident	Length			
Start	End	Hours	Reason	Acti	on
01/01/18 00:00 - 0	1/16/18 04:26	364.9	Wet Scrubber	Operation	Exempt
01/17/18 22:55 - 0	3/29/18 18:45	1705.2	Wet Scrubber	Operation	Exempt
03/31/18 23:59 - 0	3/31/18 23:59	0.0	Wet Scrubber	Operation	Exempt

Total Duration: 2064.3 Hours

#### Navajo Unit 3 Excess Dry Opacity Report

SRP - Navajo, Unit 3 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00 End: 03/31/2018 23:59

POLLUTANT: 1 Opacity SOURCE: Unit 3 EPISODE: Opacity Over Limit

Incident Start

Incident End

Length Hours

Reason

No Excess Emissions

Total Duration 0.0 Hours

#### Navajo Unit 3 Opacity Downtime Report

SRP - Navajo, Unit 3 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00 End: 03/31/2018 23:59

POLLUTANT: 3 Opacity SOURCE: Unit 3 EPISODE: Opacity Analyzer Downtime

Incident Start	Incident End	Length Mins.	Reason
01/15/18 09:42 -	01/15/18 09:53	12 Monitor	Maintenance Activities
01/30/18 09:54 -	01/30/18 09:59	06 Monitor	Maintenance Activities
02/20/18 09:54 -	02/20/18 09:59	06 Monitor	Maintenance Activities
03/01/18 15:48 -	03/01/18 15:53	06 Monitor	Maintenance Activities
03/08/18 15:18 -	03/08/18 15:23	06 Monitor	Maintenance Activities
03/19/18 10:36 -	03/19/18 10:41	06 Monitor	Maintenance Activities
03/20/18 16:00 -	03/20/18 16:53	54 Quality	Assurance Activities
03/28/18 10:24 -	03/28/18 10:29	06 Monitor	Maintenance Activities

TOTAL DURATION = 1.7 Hours

# 40 CFR Part 60 CEM Quarterly Report Excess Emission and Monitoring System Performance

Reporting dates 01/01/2018 00:00 through 03/31/2018 23:59

Pollutant: SO2 lb/MMBtu (365 Boiler Operating Day rolling average) Emission Limit: 0.1

Company Name: SRP - Navajo, Unit 3

Address: Navajo Generating Station Page, AZ 86040

Unit Description: coal-fired cyclonic boiler power plant

Total source operating time in reporting period: 2035.7 hours

Emission Data Summary(note 1 )	CEMS Downtime Summary(note 1 )		
1. Duration of excess emissions in period due t	.0:	1. Duration of CEMS downtime in period due to:	
a. Start Up/Shut Down	0.0	a. Monitoring Equipment Malfunction	0.0
b. Control Equipment Failure	0.0	b. Non-Monitoring Equipment Malfunction	0.0
c. Process Problems	0.0	c. Quality Assurance	1.0
d. Exempt (Wet Stack - Scrubber Operation)	0.0	d. Other Known Monitor Downtime Cause	0.0
e. UnKnown Excess Emissions Cause	0.0	e. UnKnown Monitor Downtime Cause	0.0
2. Total duration of excess emission	0.0	2. Total duration of CEMS downtime	1.0
3. Excess emission duration (%)	0.00%	3. CEMS downtime (%)	0.05%

Total source operating time in reporting period: = Time in the Report Period minus the Process Down Episode Time.

I have personally examined and am familiar with the information submitted in this document and all attachments and certify (based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information) that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement(s) made in this document or its attachments may be punishable as a criminal offense."

Name: Walter H. Begay

Signature:

Title: Air Quality Environmental Engineer

4/26/18

#### Navajo Unit 3 SO2 Excess Emission Report

SRP - Navajo, Unit 3 Navajo Generating Station Start: 01/01/2018 00:00

End: 03/31/2018 23:59

Page, AZ 86040

Emission Limit: 1.0 lb/MMBtu, 3 hr. plant wide average

Date and Time Period

Magnitude

Reason

No Excess Emission

#### Navajo Unit 3 SO2 Excess Emission Report

SRP - Navajo, Unit 3 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00 End: 03/31/2018 23:59

Emission Limit: 0.1 lb/MMBtu, 365 BOD rolling average

Date and Time Period Magnitude

Reason

No Excess Emission

#### Navajo Unit 3 SO2 Downtime Report

SRP - Navajo, Unit 3 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00

End: 03/31/2018 23:59

POLLUTANT: 3 SO2 ppm SOURCE: Unit 3 EPISODE: SO2 Analyzer Downtime

Incident Start

Incident Length End

Hrs.

Reason

03/21/18 10:00 - 03/21/18 10:59

Quality Assurance Activities

#### Navajo Unit 3 CO2 Downtime Report

SRP - Navajo, Unit 3 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00 End: 03/31/2018 23:59

POLLUTANT: 3 CO2 cor SOURCE: Unit 3 EPISODE: CO2 Analyzer Downtime

Incident Incident Length End

Hrs.

Reason

Start 03/21/18 10:00 - 03/21/18 10:59 1

Quality Assurance Activities

#### Navajo Unit 3 NOx Excess Emission Report

SRP - Navajo, Unit 3 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00 End: 03/31/2018 23:59

Emission Limit: 0.24 lb/MMBtu, 30 Day rolling average

Date and Time Period Magnitude

Reason

No Excess Emission

#### Navajo Unit 3 NOx Downtime Report

SRP - Navajo, Unit 3 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00 End: 03/31/2018 23:59

POLLUTANT: 3 NOx cor SOURCE: Unit 3 EPISODE: NOx Analyzer Downtime

Incident Incident Length

Reason

Start End
03/21/18 10:00 - 03/21/18 10:59

Hrs. Reason

1 Quality Assurance Activities

#### Navajo Unit 3 CO Excess Emission Report

SRP - Navajo, Unit 3 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00

End: 03/31/2018 23:59

Emission Limit: 0.23 lb/MMBtu, 30 Day rolling average

Date and Time Period

Magnitude

Reason

No Excess Emission

#### Navajo Unit 3 CO Excess Emission Report

SRP - Navajo, Unit 3 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00 End: 03/31/2018 23:59

Emission Limit: 0.15 lb/MMBtu, 12-Month rolling average

Date and Time Period

Magnitude

Reason

No Excess Emission

#### Navajo Unit 3 CO2 Downtime Report

SRP - Navajo, Unit 3 Navajo Generating Station Page, AZ 86040

Start: 01/01/2018 00:00 End: 03/31/2018 23:59

POLLUTANT: 3 CO2 cor SOURCE: Unit 3 EPISODE: CO2 Analyzer Downtime

Incident Start

Incident End

Length

Reason

03/21/18 10:00 - 03/21/18 10:59

Hrs.

Quality Assurance Activities